

JOINT PROPOSED PRETRIAL ORDER

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

ATTACHMENT E

Pulliam's Witness List

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;
SHERIFF ERIC FAGAN, in his individual
capacity; OFFICER ROBERT
HARTFIELD, in his individual capacity;
OFFICER JONATHAN GARCIA, in his
individual capacity; OFFICER TAYLOR
ROLLINS, in his individual capacity; and
OFFICER RICKY RODRIGUEZ, in his
individual capacity,

Defendants.

PLAINTIFF'S WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's Required Pretrial and Trial Material Procedures, Plaintiff Justin Pulliam provides the following Witness List:

Name	Address	Subject Matter and Substance of Testimony
Justin Pulliam	c/o Christen Mason Hebert INSTITUTE FOR JUSTICE 816 Congress Ave. Suite 970 Austin, TX 78701	Personal background as an independent citizen journalist; typical encounters with law enforcement, including Fort Bend County Sheriff's officers; the July 12, 2021 press conference; December 21, 2021 exclusion from scene and arrest; indictment and trial

		following December 21, 2021 arrest; Fort Bend County's other arrests for interference with public duties; damages
Sheriff Eric Fagan	c/o Kevin Hedges Assistant Fort Bend County Attorney 401 Jackson St., 3rd Floor Richmond, TX 77469	Personal background and election to Sheriff; Fort Bend County Sheriff's Office policies; personal interactions with Pulliam and Fort Bend County Sheriff's Office's customs and policies concerning Pulliam; events at and near Jones Creek Ranch Park on July 12, 2021; Pulliam's exclusion from scene and arrest on December 21, 2021; visit to Pulliam in Fort Bend County Jail; Fort Bend County Sheriff's Office actions following Pulliam's arrest
Lieutenant Taylor Rollins	c/o Kevin Hedges Assistant Fort Bend County Attorney 401 Jackson St., 3rd Floor Richmond, TX 77469	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021
Officer Ricky Rodriguez	c/o Kevin Hedges Assistant Fort Bend County Attorney 401 Jackson St., 3rd Floor Richmond, TX 77469	Personal background; Pulliam's exclusion from scene and arrest on December 21, 2021
Detective Travis James	c/o Kevin Hedges Assistant Fort Bend County Attorney 401 Jackson St., 3rd Floor Richmond, TX 77469	Personal background; Pulliam's December 21, 2021 arrest and the subsequent investigation

The summaries of the anticipated testimony for each witness are intended to provide a high-level description of expected testimony. Plaintiff reserves the right to examine witnesses on other topics or subsidiary topics as needed to prove his claims or respond to defenses.

Plaintiff also reserves the right to call, live or by deposition, any witness called by Defendants or identified in Defendants' witness list.

Dated: July 1, 2025

Respectfully submitted,

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

Texas Bar No. 24099898

Federal ID No. 3844981

Jeffrey Rows*, of counsel

Texas Bar No. 24104956

Michael Peña*, of counsel

Texas Bar No. 24131580

INSTITUTE FOR JUSTICE

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Attorneys for Plaintiff

**Admitted pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert
Christen Mason Hebert, Attorney-in-Charge

Counsel for Plaintiff